

Laundry list of topics to expect LWG to raise during FS discussion

- Questions about eval of alternatives
- Cost and duration assumptions. Inconsistencies in cost tables.
- Costs may not be high enough – they don't account for moving dredges, containment, assume dredges working 24 hours per day but this goes against quality of life issues – light and noise 24/7. LWG used 12 hours per day. LDW is 12 hrs/day. If you add in costs associated with these things costs are higher.
- PTW – concerns about that - if the PTW definitions had been applied to Mc&B it would have been mostly dredged and capped. In LDW, how PTW is handled is stark contrast to PH. PCB levels in LDW were higher. PTW was not identified.
- Prescriptive tech assignments.
- Presumption of sheet pile for dredging – MC&B would have been different if we did that there.
- Addition of riverbanks – confusion – had originally been under DEQ jurisdiction. How they are defined.
- Inappropriate benthic risk analysis
- Higher cost not leading to greater effectiveness.
- $T > 0$
- Residual risk
- Lack of clarity in determination of tech assignment
- Making expensive alternatives look better than lower cost alternatives.
- Unclear re LT and ST effectiveness.
- In order to evaluate the technology and costs, lack of info at granular level to break things down – no info on an SDU by SDU basis for what the costs include. PTW, alternative E – additional \$400M of disposal costs but it is unclear where the waste comes from – which SMA/SDU?
- Why is PTW being pre-treated when going to Subtitle C LF? Should be covered under RCRA.
- Costs on SDU or river mile by river mile basis? Not really a goal of the FS to do the allocation-type work.
- LWG team says there is not enough info or showing of the work that went into cost estimating or tech assignments.
- Reaction to decision tree – not sufficient flexibility within dec tree model to allow for a RD/RA based assignment of remedial technology. Have not yet been able to run a site completely through the dec. tree.

We are seeking LWG to tell us:

- What is missing/cannot find in order to get cost estimates?
- Prescription – give specific examples – what are they thinking? Is there a way to build this into a logic path . . .